

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MDL No. 1456
LITIGATION)	
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THIS DOCUMENT RELATES TO)	CIVIL ACTION: 01-CV-12257-PBS
ALL CLASS ACTIONS)	Judge Patti B. Saris
<hr/>		Chief Magistrate Judge Marianne B. Bowler

**PLAINTIFFS' RESPONSE TO TRACK 1 DEFENDANTS' REQUEST
FOR PRODUCTION OF DOCUMENTS RELATING TO PLAINTIFFS'
PROPOSED PROOFS OF CLAIM**

Plaintiffs object to this request as premature. When the time for proposing jury interrogatories and/or claim forms arises plaintiffs will produce such forms.

DATED: February 7, 2005

By /s/ Steve W. Berman

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CERTIFICATE OF SERVICE

I hereby certify that I, Steve W. Berman, an attorney, caused a true and correct copy of the foregoing, **PLAINTIFFS' RESPONSE TO TRACK 1 DEFENDANTS' REQUEST FOR PRODUCTION OF DOCUMENTS RELATING TO PLAINTIFFS' PROPOSED PROOFS OF CLAIM** to be delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on February 7, 2005, a copy to Verilaw Technologies for Posting and notification to all parties

By /s/ Steve W. Berman

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